

Rickner PLLC

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December 21, 2021

Via ECF

Hon. Vernon S. Broderick
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

APPLICATION GRANTED

SO ORDERED

VERNON S. BRODERICK

U.S.D.J. 12/22/2021

On or before January 27, 2022, the parties are directed to file a joint status update on the prospects of settlement and whether there is any need to extend the stay of discovery.

Re: *G & G Closed Circuit Events LLC v. Bertolini et al.*, 21-cv-07351-VSB

Dear Judge Broderick,

We, along with The Fried Firm PLLC, represent Defendants and we submit this letter to request a stay of discovery while we attempt to resolve this action.

The Defendants, a sports bar and the owner, have limited funds. Any litigation expenses are best spent in preparing for and attending mediation. We have a mediator, as well as a January 20, 2022 date for mediation, during which all parties will be present virtually. The Defendant have made a demand, and Plaintiffs have made an offer. The parties and the mediator have also had a productive call to discuss the mediation and make preparations in advance. In sum, we believe the parties are on track to reaching a settlement.

Thus, we ask that this Court stay discovery until the mediation process is complete. We have spoken with Plaintiff's counsel who consented to this request for a stay, but has not read this letter.

We thank the court for considering this request.

Respectfully,

/s/

Rob Rickner